



December 15, 2004

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Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. 343 r (6) and in accordance with the authorized provisions of 21CFR 101.93, Advocare provides notification for statements on dietary supplement labels as follows:

The name and address of the manufacturer, packer or distributor of the dietary supplement that bears the statements:

AdvoCare International, L.P.
2727 Realty Road, Suite 134
Carrollton, TX 75006

Product Name: Biotic Buddies

Statement

Basis for Statement

Provides digestive support

Lactobacillus acidophilus
Bifidobacterium bifidum
Fructooligosaccharides

Supports healthy intestinal function

Lactobacillus acidophilus
Bifidobacterium bifidum
Fructooligosaccharides
Moomiyo

Provides support to the immune system

Lactobacillus acidophilus
Bifidobacterium bifidum
Fructooligosaccharides
Moomiyo

Certification

The undersigned certifies that the information contained in this notice is complete and accurate and that Advocare International, L.P. has substantiation that the statements are truthful and not misleading.

Respectfully yours,

Sidney Stohs, Ph.D.
Senior Vice President, Research and Development
AdvoCare International, L.P.

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